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**March 17, 2022**

**VIA ECF**

The Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street, New York, New York 10007

SO ORDERED.

/s/ Alvin K. Hellerstein  
March 18, 2022

**RE: *United States v. Adael Figaro* 21 Cr. 132 (AKH)**  
**Modification of Bail Conditions**

Dear Judge Hellerstein:

I represent Mr. Adael Figaro in the above referenced matter. We write to respectfully request that the bail conditions set by Your Honor on December 2, 2021, be modified to remove GPS location monitoring as a condition of bail.

Should our request be granted, Mr. Figaro's remaining bail conditions will be as follows: \$150,000 personal recognizance bond, to be co-signed by two financially responsible persons; travel restricted to the Southern/Eastern Districts of New York and the District of New Jersey; surrender travel documents and make no new applications; pretrial supervision as directed by Pretrial Services; not to possess a firearm, destructive device, or other dangerous weapon; and no contact with co-defendants unless in the presence of counsel.

During the course of this case, the Court has progressively loosened the restrictions on Mr. Figaro's bail conditions as a result of the improvements that Mr. Figaro had been and continues to make. Mr. Figaro unfortunately became homeless from October 2021 until the end of December 2021. He overcame homelessness and found stable housing where he has been renting a room with his partner since January 2022. During his period of homelessness, he kept pretrial services informed of his whereabouts and continued to go to work. His compliance has generally improved, and he continues to seek and obtain better paying work to maintain stability and provide for his son. Given his improved compliance and the fact that dangerousness has never been an issue in his case, we are requesting that the GPS location monitoring be removed.

I have conferenced this matter with the Government and pretrial services and all parties consent to the proposed bail modification.

For those reasons, Your Honor's immediate attention is appreciated.

Respectfully submitted,



Esere J. Onaodowan, Esq.

CC via email: AUSAs Patrick Moroney and Marguerite Colson  
Pretrial Officer Jonathan Lettieri